

SEDGWICK LLP

RALPH A. CAMPILLO (BAR NO. 70376)

Email: ralph.campillo@sedgwicklaw.com

WENDY A. TUCKER (BAR NO. 121122)

Email: wendy.tucker@sedgwicklaw.com

MICHAEL M. WALSH (BAR NO. 150865)

Email: michael.walsh@sedgwicklaw.com

801 South Figueroa Street, 19th Floor

Los Angeles, CA 90017-5556

Telephone: 213.426.6900

Facsimile: 213.426.6921

Attorneys for Defendant

THOMAS P. SCHMALZRIED, M.D., A Professional

Corporation and THOMAS P. SCHMALZRIED, M.D.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA (San Francisco)

WAYNE JOLLY and CINDY JOLLY,

Plaintiff(s),

v.

DEPUY ORTHOPAEDICS, INC.;
JOHNSON & JOHNSON SERVICES,
INC.; JOHNSON & JOHNSON, INC.;
DEPUY INTERNATIONAL LTD;
THOMAS P. SCHMALZRIED, M.D.,
THOMAS P. SCHMALZRIED, M.D., A
PROFESSIONAL CORPORATION; and
DOES 1 through 20, inclusive,

Defendants.

CASE NO. CV-12-1974 JCS

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint served: March 20, 2012

Removal Date: April 20, 2012

Current Response Date: April 27, 2012

Agreed Response Date: May 27, 2012

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Defendants Thomas P. Schmalzried, M.D., a Professional Corporation and Thomas P. Schmalzried, M.D. ("Defendants") hereby request, and Plaintiffs Wayne Jolly and Cindy Jolly ("Plaintiffs") hereby agree to Defendants' request, for an extension of time for Defendants to file a response to Plaintiffs' Complaint. Plaintiffs' Complaint was filed on March 2, 2012,

1 Defendants were served on or about March 20, 2012, and the case was removed on April 20,
2 2012.

3
4 THE PARTIES HAVE AGREED AND HEREBY STIPULATE to extend the time for
5 Defendants to respond to May 27, 2012.

6
7 DATED: April 24, 2012

SEDGWICK LLP

8
9 By: /s/ Michael M. Walsh

10 Ralph Campillo

11 Wendy Tucker

12 Michael M. Walsh

Attorneys for Defendants

13 THOMAS P. SCHMALZRIED, M.D., A

Professional Corporation and THOMAS P.

14 SCHMALZRIED, M.D.

15 DATED: April 24, 2012

SEEGER ● SALVAS LLP

16
17
18 By: /s/ Adam R. Salvas

19 Kenneth M. Seeger

Adam R. Salvas

20 Brian J. Devine

Attorneys for Plaintiffs

21 WAYNE JOLLY and CINDY JOLLY

Pursuant to Section X of General Order No. 45 regarding Electronic Court Filing, I hereby certify that the content of this document is acceptable to Adam R. Salvas, counsel for Plaintiffs Wayne Jolly and Cindy Jolly, and that I have obtained counsel's authorization to affix his electronic signature to this document.

DATED: April 24, 2012

SEDGWICK LLP

By: /s/ Michael M. Walsh

Ralph Campillo

Wendy Tucker

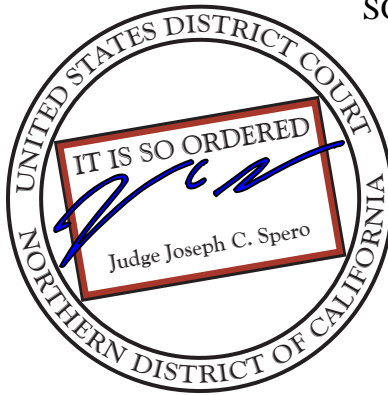
Michael M. Walsh

Attorneys for Defendant

THOMAS P. SCHMALZRIED, M.D., A

Professional Corporation and THOMAS P.
SCHMALZRIED, M.D.

Dated: 4/27/12



CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick LLP, 801 South Figueroa Street, 19th Floor, Los Angeles, California 90017-5556. On April 26, 2012, I served the within document(s):

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT (L.R. 6-1)

- ☐ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California.
- ☒ ELECTRONIC MAIL – by serving via CM/ECF to the United States District Court, Central District of California, addressing all parties appearing on the Courts ECF service list.

Kenneth M. Seeger
Adam R. Salvas
Brian J. Devine
SEEGER ● SALVAS LLP
455 Market Street, Suite 1530
San Francisco, CA 94105

Attorneys for Plaintiffs
WAYNE JOLLY and CINDY JOLLY

Telephone: (415) 981-9260
Facsimile: (415) 981-9266

Alexander G. Calfo
Kelley S. Olah
Gabrielle Anderson-Thompson
YUKEVICH CALFO & CAVANAUGH
355 S. Grand Avenue, 15th Floor
Los Angeles, CA 90071-1560

Attorneys for Defendant
DePUY ORTHOPAEDICS, INC.

Telephone: (213) 362-7777
Fax: (213) 362-7788
ACalfo@yukelaw.com
KSpencer@yukelaw.com

I declare that I am employed in the office of a member of the bar of this court at who direction the service was made.

Executed at Los Angeles, California on April 26, 2012.

/s/Barbara Ferguson
Barbara Ferguson